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## **U.S. Department of Justice**



United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

April 27, 2018

## **BY ECF & EMAIL**

The Honorable Gregory H. Woods United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re: <u>United States</u> v. <u>Grant, et al.</u>

S2 16 Cr. 468 (GHW)

Dear Judge Woods:

The Government respectfully submits this letter in accordance with this Court's April 23, 2018 order for a bill of particulars.

First, the Government expects to introduce evidence at trial that the following individuals, not named in the Indictment, were members of the conspiracy:

Philip Banks III

Michael Milici

Stephen McAllister

Michael Andreano

**David Colon** 

Andrew Capul

**Eddie Gardiner** 

Eric Rodriguez

James McCarthy

Brian McGinn

Second, the Government expects to introduce evidence at trial regarding the following specific official acts underlying Count One which were committed by or at the direction of coconspirators other than James Grant or Michael Harrington (and notes its intent to prove an asopportunities-arise conspiracy beyond the commission of the specific acts listed below):

- The promotion of James Grant to Deputy Inspector and to the command of the 19<sup>th</sup> Precinct in or around June 2014, influenced by Philip Banks as well as Michael Harrington;
- The promotion of Michael Milici to second grade Detective in or around September 2014, influenced by Philip Banks as well as Michael Harrington;

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- The command transfers of approximately six police officers (the "Transferred Officers") in or around 2014, influenced by Philip Banks as well as Michael Harrington;
- Police escort on or about April 30, 2014 for an associate of Rechnitz ("Individual-1") provided at the direction of Philip Banks as well as Michael Harrington;
- Police escort on or about September 1, 2014 for an associate of Rechnitz and Reichberg ("Individual-2");
- Additional September 2014 police escort provided by Andreano for an associate of Reichberg ("Individual-3");
- Police response on or about February 2, 2015 provided by Andreano to Reichberg's car for a private dispute;
- Provision of a desk appearance ticket on or about March 9, 2015 for an associate of Reichberg who was under arrest ("Individual-4");
- Interference with multiple arrests of an associate of Reichberg ("Individual-5"), including by Stephen McAllister, on or about the following dates: February 16, 2014; October 28, 2015; and December 16, 2015;
- Interference with a traffic incident for an individual associated with Reichberg ("Individual-6") by Andreano on or about March 20, 2015;
- Police installment of lights at a synagogue associated with Reichberg in Brooklyn;
- Police response to Reichberg's home by Milici and Andreano in order to reprimand a neighbor's contractor;
- Police escort on or about March 11, 2008 through the Lincoln Tunnel for an associate of Reichberg and Rechnitz;
- Expediting of a gun license for at least one associate ("Individual-7") of Rechnitz and Reichberg;
- Ticket fixing for at least one associate of Reichberg around late 2013 into early 2014 ("Individual-8"); and
- The appointment of at least one of Reichberg's personal doctors as a police surgeon.

Third, the Government no longer intends to proceed on Count Six at trial.

Respectfully submitted,

GEOFFREY S. BERMAN United States Attorney

By: /s/

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cc: All Counsel of Record (by electronic mail)